

**UNITED STATE DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS  
IN CLERKS OFFICE**

Albert William Bleau Jr.

Plaintiff

2006 MAR 10 A 9:46

U.S. DISTRICT COURT  
DISTRICT OF MASS.

vs.

Civil Action  
No. 04 – 10469REK

Greater Lynn Mental Health  
& Retardation Association, et al,

Defendants

**ADDITIONAL DISCLOSURES**

Pursuant to Fed.R.Civ.P. Rule 26(a) (1), the plaintiff submits additional disclosures including a statement of Insurance, the plaintiff's basis for damages for the breach of contract, defamation and ADA claims and a list of individuals who will be either subject to a deposition, written questions. Additional individuals have been requested to submit affidavits including locally elected officials, former board members and employees, and former and current Human Resource Directors and Executive Directors or supervisors of various state agencies and private non profit companies.

The plaintiff might require leave of the court to obtain additional written questions or depositions if various parties refuse to submit an affidavit or if their affidavit contains omissions or does not address key aspects of the claims.

**INSURANCE**

The plaintiff has no insurance to compensate for damages from the claims of defamation, breach of contract or ADA.

### **BASIS AND CLAIM FOR DAMAGES**

The plaintiff's total claim for damages is \$3,993,790, Three Million, Nine Hundred and Ninety Three, Seven Hundred and Ninety Dollars.

A copy of the plaintiff's GLMHRA pay stub has been previously submitted to this court and the defendants. The combined salaries from the GLMHRA and EMHC is also confirmed in the Severance Agreement that was based on six months salary from both corporations.

The basis for compensatory damages is the combined annual salary and benefits that the plaintiff received as Executive Director of GLMHRA and EMHC while employed by the corporations or \$136,000 and \$34,600 respectively plus an annual contribution to the plaintiff's retirement plan of \$20,000, 7.65% contribution to Social Security and Medicare for plaintiff's annual salary totaling \$10,404 and the annual cost of the GLMHRA annual medical, disability and dental plans costing approximately \$10,000.

The total annual compensation equals \$191,404 and the plaintiff is requesting damages from November 8, 2000 until May 2, 2011, plaintiff's social security retirement age of 67 representing ten years and five months. The total compensatory damages claim equals \$1,993,790, One Million, Nine Hundred and Ninety Three Thousand, Seven Hundred and Ninety Dollars.

In addition, the plaintiff is requesting One Million Dollars for punitive damages for breach of contract and damages from emotional distress and mental anguish resulting from defamation by the defendant and its agents: Attorney's Roderick MacKleish, Robert Sherman and Robert Griffin and auditors James Mecone and John Sanella and others.

The plaintiff is also requesting an additional One Million Dollars for punitive damages for emotional distress, mental anguish and liability resulting from the ADA claim.

**INDIVIDUALS AND ORGANIZATIONS PROVIDING DISCOVERY THROUGH  
INTERROGATORIES AND OR WRITTEN QUESTIONS**

Defendant's counsel, at the January 6, 2006 meeting with the plaintiff, agreed to submit the names, addresses and telephone numbers of all EMHC, GLMHRA and Bridgewell past and present board members. The defendant has not sent the addresses to the plaintiff as agreed.

The plaintiff has included those addresses, names and telephone numbers that were obtainable from the telephone directory and has attached a print out from Bridgewell's web site listing the current board without home or work addresses.

Plaintiff expects to submit written questions to board members James Purdy, former Regional Director for the DMH, Carla Saccone, former Area Director for the DMH, Paul Shovey, Gailanne Reeh and three additional former board members who were involved in the 2003 hiring decision for the Executive Director and whose names, addresses and telephone numbers have not been given to the plaintiff by the defendant, Bridgewell, Inc.

Affidavits will be requested from numerous individuals and agencies and companies involved in these complaints and from whom the plaintiff sought business or employment and a deposition will be conducted with former and now current board member, Nancy Rizzo.

<b><u>Name</u></b>	<b><u>Title</u></b>	<b><u>Address</u></b>	<b><u>Telephone</u></b>	<b><u>Discovery</u></b>	<b><u>Area for Discovery</u></b>
Norman Thibodeau	Past Bd. Member EMHC, GLMHRA & Clerk GLMHRA	40 North Franklin St. Lynn, MA 01904	(781) 598-3575	Affidavit Written Questions	ADA, Defamation, Breach of Contract
Samuel Vitali	Past Vice President EMHC	3 Townsend Terr. Lynn, MA 01904	(781) 592-5068	Deposition	ADA, Defamation, Breach of Contract
Robert Tucker	Past Treasurer, President GLMHRA, Incorporator Sole EMHC	295 Lynn Shore Dr. Lynn, MA 01902	(781) 595-2119	Deposition	ADA, Defamation, Breach of Contract
Claire Jackson	Past President, Vice President GLMHRA	Jackson St. Lynn, MA 01907	(781)	Deposition	Defamation, Breach of Contract
Thomas Manning	Past President, Vice President Treasurer, GLMHRA	Beverly, MA	9978)	Deposition	Defamation, Breach of Contract
Nancy Rizzo	Past & Current Board Member Bridgewell	15 Puritan Rd. Swampscott, MA 01907	(781)	Deposition	ADA, Defamation, Breach of Contract

James Cowdell	Administrator GLMHRA, Bridgewell	4 Woodlawn Ave. Lynn, MA	(781) 596-1460	Deposition	ADA Defamation, Breach of Contract
Paul Coty	Past Executive Director GLMHRA			Deposition	ADA Defamation, Breach of Contract

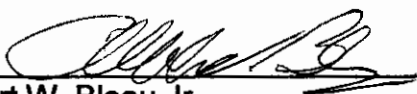
<b>Elaine White</b>	<b>Director of Operations GLMHRA, Safety Director Bridgewell</b>	<b>7 Butterfield Rd. Saugus, MA 01906</b>	<b>(781) 233-3797</b>	<b>Deposition</b>	<b>ADA Defamation, Breach of Contract</b>
<b>Kelly Johnson</b>	<b>Director of Retardation Services, GLMHRA and Bridgewell</b>	<b>24 Kelly Lane Lynn, MA 01904</b>	<b>(781) 598-0624</b>	<b>Deposition</b>	<b>ADA Defamation, Breach of Contract</b>
<b>Anne Perry</b>	<b>Past Human Resources Director GLMHRA</b>	<b>Marblehead, MA 01945</b>	<b>(781)</b>	<b>Written Questions</b>	<b>ADA Defamation, Breach of Contract</b>
<b>Sue Villett</b>	<b>Human Resources Director, GLMHRA and Bridgewell</b>	<b>12 Westview Cir. Peabody, MA 01960</b>	<b>(978) 531-2651</b>	<b>Written Questions</b>	<b>ADA Defamation, Breach of Contract</b>
<b>Terri White</b>	<b>Fiscal Manager, GLMHRA and Bridgewell</b>	<b>54 Emerald Dr. Lynn, MA 01904</b>	<b>(781) 599-1611</b>	<b>Deposition</b>	<b>ADA Defamation, Breach of Contract</b>
<b>Laurence Donoghue</b>	<b>Past GLMHRA Personnel Attorney</b>	<b>31 Dewey Rd. Saugus, MA 01908</b>	<b>(781) 233-5641</b>	<b>Written Questions</b>	<b>Defamation, Breach of Contract</b>

<b>Roderick MacKleish</b>	<b>Defendant</b>	<b>C/O Greenberg Traurig One International Place 20th Floor Boston, MA 02110</b>	<b>(617) 310-6000</b>	<b>Deposition</b>	<b>Defamation, Breach of Contract</b>
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<b>Robert Sherman</b>	<b>Defendant</b>	<b>C/O Greenberg Traurig One International Place 20th Floor Boston, MA 02110</b>	<b>(617)310- 6000</b>	<b>Deposition</b>	<b>Defamation, Breach of Contract</b>
<b>Robert Griffin</b>	<b>Defendant</b>	<b>Krokidas and Bluestein 600 Atlantic Ave. Boston, MA Reading, MA</b>	<b>(617) 951-82590</b>	<b>Written Questions</b>	<b>Defamation, Breach of Contract</b>
<b>Janine Brown Smith</b>	<b>Past GLMHRA Director of contracts and Quality Assurance</b>	<b>Reading, MA</b>		<b>Deposition</b>	<b>Defamation, Breach of Contract</b>
<b>James Mecone</b>	<b>Current Auditor GLMHRA and Bridgewell</b>	<b>McGladrey and Pullen 7 New England Parkway Burlington, MA 01803</b>		<b>Deposition</b>	<b>ADA Defamation, Breach of Contract</b>
<b>John Sanella</b>	<b>Current Auditor GLMHRA and Bridgewell</b>	<b>McGladrey and Pullen 7 New England Parkway Burlington, MA 01803</b>		<b>Deposition</b>	<b>ADA Defamation, Breach of Contract</b>
<b>Mary Lou Sutter</b>	<b>Past Commission er Department of Mental Health (DMH)</b>			<b>Written Questions</b>	<b>ADA Defamation</b>



Respectfully submitted,



Albert W. Bleau Jr.  
505 Paradise Rd. #208  
Swampscott, MA 01907  
(781) 962-2662

Dated: March 10, 2006

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the above document was served upon defendants GLMHRA, et. al by first class mail on March 10, 2006

